

**IN THE UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF GEORGIA
MACON DIVISION**

IN RE:

TERI G. GALARDI,

Debtor.

CHAPTER 11

CASE NO. 22-50035-JPS

RESPONSE TO FILING BY CREDITOR OF BAR COMPLAINT (DKT. 510)

Thomas T. McClendon, as Liquidating Trustee of the Galardi Creditors Trust (the “Liquidating Trustee”), hereby responds to “Creditor Tiffany Thompson (claim #114) Notice of Filing Bar Complaint Against Trustee Mr. McClendon Because He Said He Will Not Pay Me What I am Owed”. (*See* Docket No. 510). In support of this response, the Liquidating Trustee states as follows:

1. The undersigned was appointed as the Liquidating Trustee of the Galardi Creditor Trust (the “Trust”) by order dated April 14, 2023 (Dkt. 410).

2. As contemplated under the Galardi Creditor Trust Agreement executed by Teri Galardi, as debtor and grantor, and the undersigned, as Liquidating Trustee, the Liquidating Trustee began working to calculate and make the first interim distribution to creditors. The Liquidating Trustee has made an initial distribution to many creditors under the Trust.

Attorney Lien Claims

3. Many of the creditors hold claims based on debts owed as evidenced by civil actions filed under the Fair Labor Standard Act (“FLSA”) or Florida Minimum Wage Act (“FMWA”) in various courts. As part of the claim review process, the Liquidating Trustee received, from several attorneys, certain claims of liens (“Attorney Lien Claims”). The Attorney Lien Claims were filed in the respective civil actions. Pursuant to these Attorney Lien Claims, certain attorneys asserted a charging lien against moneys due from the Debtor as defendant in these civil actions. Those

attorney lien claims “cloud the title” and right of the respective creditors to receive funds from the Trust free and clear of such Attorney Lien Claims.

4. One of these cases is *Milner v. Galardi*, 20-cv-23230 (S.D. Fla.). In that case, The Law Office of Astrid E. Gabbe, P.A. and Ainsworth Dudley asserted a charging lien against Ameera Brewer, Rasheedah Mays, and Tiffany Thompson on “on all money due from defendant on any such judgment, settlement or award, and any and all assets, property, money or proceeds retained, received or recovered by Brewer, Mays and Thompson, or any of their assigns in connection with this judgment, settlement or award.” A copy of such charging lien is attached as **Exhibit A**.

5. The Liquidating Trustee sent letters to Ms. Brewer, Ms. Mays, and Ms. Thompson regarding the proposed first interim distributions. The Liquidating Trustee proposed to address (i.e., satisfy) the Attorney Lien Claims as charging liens in the first distribution. Under the Trustee’s proposal, any further distributions by the Trust would be “free and clear” so that any remaining further distributions would be paid exclusively to the creditors (Brewer, Mays, and Thompson).

6. Ms. Brewer and Ms. Gabbe and Mr. Dudley were able to reach an agreement. As such the charging lien was released as to Ms. Brewer. A copy of such release is attached as **Exhibit B**.

7. Ms. Mays and Ms. Thompson did not reach a settlement with the attorneys (Ms. Gabbe and Mr. Dudley). Accordingly, the Liquidating Trustee was faced with competing demands for the distribution on such claims. On one hand, Ms. Mays and Ms. Thompson asserted they were entitled to the full amount of the distribution due to such claim. On the other hand, Ms. Gabbe and

Mr. Dudley asserted their rights under the Attorney Lien Claims to receive payment to satisfy their Attorney Lien Claims before Ms. Mays and Ms. Thompson received anything.

8. Based on these facts and circumstances, the Liquidating Trustee has retained Patricia Redmond of Stearns Weaver Miller Weissler Alhadeff & Sitterson, P.A. (“Redmond”) to file an interpleader action in the Southern District of Florida, where the Notice of Charging Lien was filed. Such interpleader action was filed in the Southern District of Florida on August 3, 2023 and assigned Case No. 23-cv-22893 (the “Interpleader Action”). Ms. Mays and Ms. Thompson are respondents in the Interpleader Action. Such respondents are in the process of being served in the Interpleader Action.

Communications with Creditor

9. The Liquidating Trustee received a call on May 26, 2023 from Ms. Thompson. The individual purporting to be Ms. Thompson told the Liquidating Trustee that her legal name was in fact Chanell Warren. The Liquidating Trustee discussed amending the claim to reflect this creditor’s legal name. To that end, the Liquidating Trustee sent the information for amending the proof of claim. A true and correct copy of such emails is attached as **Exhibit C**. The claim was never amended.

10. The Liquidating Trustee asked about the issue again on July 5, 2023, asking for a driver’s license and W-9 with the creditor’s legal name. A true and correct copy of such emails is attached as **Exhibit D**.

11. Eventually, the Liquidating Trustee received a Florida driver’s license and (after repeated issues) a W-9 for Tiffany Thompson (and not for Chanell Warren). The Liquidating Trustee has such email documentation but is not filing them of record out of concern for this creditor’s personal information. The Liquidating Trustee asked for an explanation why the creditor

was sending documentation for Tiffany Thompson when she had indicated her name was Chanell Warren. The creditor responded: “That’s the name I use now so there is no link to KOD”¹ based on prior harassment and threats. Yet in another email this creditor claims: “[m]y legal name is Tiffany Thompson.” A true and correct copy of such emails is attached as **Exhibit E**. Thus, the Liquidating Trustee has concerns that the name Tiffany Thompson is not this creditor’s legal name.

Conclusion

12. The Liquidating Trustee is not requesting a hearing on this matter. However, since this creditor alleges a bar complaint and further filed such complaint on the docket in this case, the Liquidating Trustee feels compelled to respond to such allegations in writing in this case.

Respectfully submitted this 11th day of August, 2023.

JONES & WALDEN LLC

/s/ Thomas T. McClendon

Thomas T. McClendon

Georgia Bar No. 431452

699 Piedmont Ave. NE

Atlanta, Georgia 30308

(404) 564-9300

tmccclendon@joneswalden.com

Liquidating Trustee

¹ KOD is the acronym for “King of Diamonds”. King of Diamonds is the entertainment club previously owned or controlled by Debtor Teri G. Galardi.

EXHIBIT A

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION
Case No. 20-23230-CIV-CANNON-OTAZO-REYES**

ANGELA MILNER, ET. AL,

Plaintiffs

v.

TERI GALARDI,

Defendant

**NOTICE OF FILING AND ASSERTING AMENDED CHARGING LIEN
BY THE LAW OFFICES OF ASTRID E. GABBE, P.A. AND
AINSWORTH DUDLEY, ESQ.
FOR ATTORNEYS' FEES AND COSTS**

NOTICE IS GIVEN that The Law Office of Astrid E. Gabbe, P.A. (“AG”) and Ainsworth Dudley, Esq. (“AD”) assert an attorneys’ charging lien on any judgment, settlement or award to be entered in the above-captioned proceeding, to Plaintiffs Ameera Brewer (“Brewer”), Rasheedah Mays (“Mays”) and Tiffany Thompson (“Thompson”) and on all money due from defendant on any such judgment, settlement or award, and any and all assets, property, money or proceeds retained, received or recovered by Brewer, Mays and Thompson, or any of their assigns in connection with this judgment, settlement or award. This charging lien claims attorneys’ fees and costs due AG and AD for legal services rendered to Brewer, Mays and Thompson in this proceeding. To date, nothing has been paid to the undersigned counsel and the total amount due to AG and AD is as follows:

Ameera Brewer: \$117,400.53

Rasheedah Mays: \$96,120.92

Tiffany Thompson: \$51,630.30

**Former Attorneys for Plaintiffs
Ameera Brewer, Rasheeda Mays & Tiffany
Thompson**

Astrid E. Gabbe
/s/ Astrid E. Gabbe
The Law Office of Astrid E. Gabbe, P.A.
Florida Bar No. 635383
P.O. Box 4216
Hollywood, FL 33083
Tel. (954) 303-9882
Fax. (954) 983-1427
astridgabbe@gmail.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of foregoing was served via CM/ECF, email and/or First Class U.S. Mail to the parties on the attached service list as indicated on this 10th day of July 2023.

**Former Attorneys for Plaintiffs
Ameera Brewer, Rasheeda Mays & Tiffany
Thompson**

Astrid E. Gabbe
/s/ Astrid E. Gabbe
The Law Office of Astrid E. Gabbe, P.A.
Florida Bar No. 635383
P.O. Box 4216
Hollywood, FL 33083
Tel. (954) 303-9882
Fax. (954) 983-1427
astridgabbe@gmail.com

SERVICE LIST

Served via CM/ECF

howardbrodskyesq@aol.com

Served via Email

Ameera Brewer
ameerabrewer@gmail.com

Rasheedah Mays
rasheedahmays@yahoo.com

Tiffany Thompson
goddaughterspen@gmail.com

EXHIBIT B

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION
Case No. 20-23230-CIV-CANNON-OTAZO-REYES**

ANGELA MILNER, ET. AL,

Plaintiffs

v.

TERI GALARDI,

Defendant

**NOTICE OF RELEASE OF ATTORNEY CHARGING LIEN
BY THE LAW OFFICES OF ASTRID E. GABBE, P.A.
FOR ATTORNEYS' FEES AND COSTS**

NOTICE IS GIVEN that The Law Office of Astrid E. Gabbe, P.A. ("AG") hereby releases and discharges her attorney's charging lien filed on July 10, 2022 [Doc. 199], with respect to Ameera Brewer only.

Attorneys for Plaintiffs

Astrid E. Gabbe
/s/ Astrid E. Gabbe
The Law Office of Astrid E. Gabbe, P.A.
Florida Bar No. 635383
P.O. Box 4216
Hollywood, FL 33083
Tel. (954) 303-9882
Fax. (954) 983-1427
astridgabbe@gmail.com

Interested Party

Astrid E. Gabbe
/s/ Astrid E. Gabbe
The Law Office of Astrid E. Gabbe, P.A.
Florida Bar No. 635383
P.O. Box 4216
Hollywood, FL 33083
Tel. (954) 303-9882
Fax. (954) 983-1427
astridgabbe@gmail.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of foregoing was served via CM/ECF, email and/or First Class U.S. Mail to the parties on the attached service list as indicated on this 20th day of July, 2023.

Attorney for Plaintiffs

Astrid E. Gabbe
/s/ Astrid E. Gabbe
The Law Office of Astrid E. Gabbe, P.A.
Florida Bar No. 635383
P.O. Box 4216
Hollywood, FL 33083
Tel. (954) 303-9882
Fax. (954) 983-1427
astridgabbe@gmail.com

Interested Party

Astrid E. Gabbe
/s/ Astrid E. Gabbe
The Law Office of Astrid E. Gabbe, P.A.
Florida Bar No. 635383
P.O. Box 4216
Hollywood, FL 33083
Tel. (954) 303-9882
Fax. (954) 983-1427
astridgabbe@gmail.com

SERVICE LIST

Served via CM/ECF

All parties of record

EXHIBIT C

From: [Tom McClendon](#)
To: soulfulliving2022@gmail.com
Subject: Amendment of Proof of Claim
Date: Friday, May 26, 2023 12:23:26 PM
Attachments: [114. Tiffany Thompson.pdf](#)

Your proof of claim is attached.

Link to amending the proof of claim is here: <https://ecf.gamb.uscourts.gov/cgi-bin/ePOC.pl>

We'll update your address and phone number and get you a copy of the letter I sent to all creditors.

Best,
Tom

Thomas T. McClendon, Esq.
Partner
Jones & Walden, LLC
699 Piedmont Ave, NE | Atlanta, GA 30308
(P) 404-564-9300 | (F) 404-564-9301 | tmccclendon@joneswalden.com

NOTICE: THE INFORMATION CONTAINED IN THIS ELECTRONIC COMMUNICATION AND ANY DOCUMENTS ATTACHED HERETO MAY CONTAIN CONFIDENTIAL INFORMATION WHICH IS LEGALLY PRIVILEGED AND IS INTENDED ONLY FOR THE USE OF THE INDIVIDUAL TO WHOM THE TRANSMISSION IS ADDRESSED. IF YOU ARE NOT THE INTENDED RECIPIENT, OR THE PERSON RESPONSIBLE FOR CONVEYING THE INFORMATION TO THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY DISCLOSURE, COPYING, DISTRIBUTION OR USE OF ANY INFORMATION CONTAINED IN THIS TRANSMISSION IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS TRANSMISSION IN ERROR, PLEASE IMMEDIATELY NOTIFY THE SENDER BY TELEPHONE OR REPLY BY E-MAIL AND DESTROY THIS TRANSMISSION. THANK YOU.

EXHIBIT D

From: [Tom McClendon](#)
To: ["Canda Atiya Imani X"](#)
Subject: RE: Tiffany Thompson address confirmation info
Date: Wednesday, July 5, 2023 2:55:00 PM
Attachments: [Amendment of Proof of Claim.msg](#)

Thanks for the W-9; however, it looks like this is for a business, rather than an individual.

The other issue is you and I talked about your proof of claim about a month ago. You told me that your legal name wasn't Tiffany Thompson, but Chanell Warren. (I remember you mentioned you were homeschooling your children; I told you I was homeschooled for a while). I suggested that you amend your proof of claim to your legal name. I've attached the email I send you after our call.

So please send me a driver's license with your legal name; a W-9 with your legal name and social security number and amend the proof of claim to your legal name.

I've updated your address.

Best,
Tom

Thomas T. McClendon, Esq.
Partner
Jones & Walden, LLC
699 Piedmont Ave, NE | Atlanta, GA 30308
(P) 404-564-9300 | (F) 404-564-9301 | tmccclendon@joneswalden.com

NOTICE: THE INFORMATION CONTAINED IN THIS ELECTRONIC COMMUNICATION AND ANY DOCUMENTS ATTACHED HERETO MAY CONTAIN CONFIDENTIAL INFORMATION WHICH IS LEGALLY PRIVILEGED AND IS INTENDED ONLY FOR THE USE OF THE INDIVIDUAL TO WHOM THE TRANSMISSION IS ADDRESSED. IF YOU ARE NOT THE INTENDED RECIPIENT, OR THE PERSON RESPONSIBLE FOR CONVEYING THE INFORMATION TO THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY DISCLOSURE, COPYING, DISTRIBUTION OR USE OF ANY INFORMATION CONTAINED IN THIS TRANSMISSION IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS TRANSMISSION IN ERROR, PLEASE IMMEDIATELY NOTIFY THE SENDER BY TELEPHONE OR REPLY BY E-MAIL AND DESTROY THIS TRANSMISSION. THANK YOU.

From: Canda Atiya Imani X <soulfulliving2022@gmail.com>
Sent: Saturday, July 1, 2023 3:51 AM
To: tmccclendon@joneswalden.com
Subject: Re: Tiffany Thompson address confirmation info

Yes. Please change the address to the Rockdale St address. Thank you.
I have attached my filled W-9. and will be sending my id in a separate email.
When can I anticipate the first payout please and thank you?

On Thu, Jun 29, 2023 at 9:26 AM <tmccclendon@joneswalden.com> wrote:

You will get a letter confirming the details before I send out the distributions, which I'll ask you to sign to make sure everything is correct.

The last address I have for you is

29 Wyoming Street	Apt. 14	Dorchester	MA	02121
-------------------	---------	------------	----	-------

Has your address changed to the one below?

Also, I need a driver's license or other government-issued identification and a W-9 from you before I can make any distribution. I've attached a blank W-9.

Best,
Tom

Thomas T. McClendon, Esq.

Partner

Jones & Walden, LLC

699 Piedmont Ave, NE | Atlanta, GA 30308

(P) 404-564-9300 | (F) 404-564-9301 | tmccclendon@joneswalden.com

NOTICE: THE INFORMATION CONTAINED IN THIS ELECTRONIC COMMUNICATION AND ANY DOCUMENTS ATTACHED HERETO MAY CONTAIN CONFIDENTIAL INFORMATION WHICH IS LEGALLY PRIVILEGED AND IS INTENDED ONLY FOR THE USE OF THE INDIVIDUAL TO WHOM THE TRANSMISSION IS ADDRESSED. IF YOU ARE NOT THE INTENDED RECIPIENT, OR THE PERSON RESPONSIBLE FOR CONVEYING THE INFORMATION TO THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY DISCLOSURE, COPYING, DISTRIBUTION OR USE OF ANY INFORMATION CONTAINED IN THIS TRANSMISSION IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS TRANSMISSION IN ERROR, PLEASE IMMEDIATELY NOTIFY THE SENDER BY TELEPHONE OR REPLY BY E-MAIL AND DESTROY THIS TRANSMISSION. THANK YOU.

From: Canda Atiya Imani X <soulfulliving2022@gmail.com>

Sent: Tuesday, June 27, 2023 6:03 PM

To: tmccclendon@joneswalden.com

Subject: Tiffany Thompson address confirmation info

Hello Mr. Mclendon:

I understand from Red Shield Funding you will be sending the check directly to me, will you please confirm that my address you are sending the check to is:

20 Rockdale St.
#329
Braintree, MA 02184

Also how will the check be sent, thank you?

Tiffany Thompson

EXHIBIT E

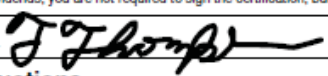
From: [Canda Atiya Imani X](#)
To: [Tom McClendon](#)
Subject: Re: Tiffany Thompson
Date: Monday, July 10, 2023 5:47:41 PM
Attachments: [image001.png](#)
[W9fortrustee.pdf](#)

That's the name I use now so there is no link to KOD. I was harassed and threatened by Akanilye Adams for suing the club. He is a pimp also that is known to beat up girls if they don't do what he says. The man is dangerous.

On Mon, Jul 10, 2023 at 4:27 PM Tom McClendon <tmccclendon@joneswalden.com> wrote:

This is what I'm seeing. Can you try to resend? Maybe try to print to pdf?

Also, can you please explain to me why you told me your name was Chanell Warren on our phone call? I'm just trying to understand.

Form W-9 (Rev. October 2018) Department of the Treasury Internal Revenue Service		Request for Taxpayer Identification Number and Certification Go to www.irs.gov/FormW9 for instructions and the latest information.		Give Form to the requester. Do not send to the IRS.
1 Name (as shown on your income tax return). Name is required on this line; do not leave this line blank.				
2 Business name/disregarded entity name, if different from above				
3 Check appropriate box for federal tax classification of the person whose name is entered on line 1. Check only one of the following seven boxes.	4 Exemptions (codes apply only to certain entities, not individuals; see instructions on page 3):			
	Exempt payee code (if any) _____			
	Exemption from FATCA reporting code (if any) _____			
	(Applies to accounts maintained outside the U.S.)			
<input type="checkbox"/> Individual/sole proprietor or single-member LLC	<input type="checkbox"/> C Corporation	<input type="checkbox"/> S Corporation	<input type="checkbox"/> Partnership	<input type="checkbox"/> Trust/estate
5 Address (number, street, and apt. or suite no.) See instructions.				
6 City, state, and ZIP code				
7 List account number(s) here (optional)				
Part I Taxpayer Identification Number (TIN)				
Enter your TIN in the appropriate box. The TIN provided must match the name given on line 1 to avoid backup withholding. For individuals, this is generally your social security number (SSN). However, for a resident alien, sole proprietor, or disregarded entity, see the instructions for Part I, later. For other entities, it is your employer identification number (EIN). If you do not have a number, see <i>How to get a TIN</i> , later.				
Note: If the account is in more than one name, see the instructions for line 1. Also see <i>What Name and Number To Give the Requester</i> for guidelines on whose number to enter.				
Part II Certification				
Under penalties of perjury, I certify that:				
1. The number shown on this form is my correct taxpayer identification number (or I am waiting for a number to be issued to me); and				
2. I am not subject to backup withholding because: (a) I am exempt from backup withholding, or (b) I have not been notified by the Internal Revenue Service (IRS) that I am subject to backup withholding as a result of a failure to report all interest or dividends, or (c) the IRS has notified me that I am no longer subject to backup withholding; and				
3. I am a U.S. citizen or other U.S. person (defined below); and				
4. The FATCA code(s) entered on this form (if any) indicating that I am exempt from FATCA reporting is correct.				
Certification instructions. You must cross out item 2 above if you have been notified by the IRS that you are currently subject to backup withholding because you have failed to report all interest and dividends on your tax return. For real estate transactions, item 2 does not apply. For mortgage interest paid, acquisition or abandonment of secured property, cancellation of debt, contributions to an individual retirement arrangement (IRA), and generally, payments other than interest and dividends, you are not required to sign the certification, but you must provide your correct TIN. See the instructions for Part II, later.				
Sign Here	Signature of U.S. person 			Date 07/07/23
General Instructions Form 1099-DIV (dividends, including those from stocks or mutual				

Thomas T. McClendon, Esq.

Partner

Jones & Walden, LLC

699 Piedmont Ave, NE | Atlanta, GA 30308

(P) 404-564-9300 | (F) 404-564-9301 | tmccclendon@joneswalden.com

NOTICE: THE INFORMATION CONTAINED IN THIS ELECTRONIC COMMUNICATION AND ANY DOCUMENTS ATTACHED HERETO MAY CONTAIN CONFIDENTIAL INFORMATION WHICH IS LEGALLY PRIVILEGED AND IS INTENDED ONLY FOR THE USE OF THE INDIVIDUAL TO WHOM THE TRANSMISSION IS ADDRESSED. IF YOU ARE NOT THE INTENDED RECIPIENT, OR THE PERSON RESPONSIBLE FOR CONVEYING THE INFORMATION TO THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY DISCLOSURE, COPYING, DISTRIBUTION OR USE OF ANY INFORMATION CONTAINED IN THIS TRANSMISSION IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS TRANSMISSION IN ERROR, PLEASE IMMEDIATELY NOTIFY THE SENDER BY TELEPHONE OR REPLY BY E-MAIL AND DESTROY THIS TRANSMISSION. THANK YOU.

From: Canda Atiya Imani X <soulfulliving2022@gmail.com>

Sent: Friday, July 7, 2023 5:58 PM

To: tmccclendon@joneswalden.com

Subject: Tiffany Thompson

Hi, I changed my name because I was being threatened by the club manager and some other people for filing the lawsuit. I was the person that hired the first lawyer that filed the case back in 2013. My legal name is Tiffany Thompson. Here is my W9.

**IN THE UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF GEORGIA
MACON DIVISION**

IN RE:

TERI G. GALARDI,

Debtor.

CHAPTER 11

CASE NO. 22-50035-JPS

CERTIFICATE OF SERVICE

This is to certify that I have on this day electronically filed the foregoing *Response to Filing by Creditor of Bar Complaint (Dkt. 510)* (the “Response”) using the Bankruptcy Court’s Electronic Case Filing program, which sends a notice of and an accompanying link to the Notice to the following parties who have appeared in this case under the Bankruptcy Court’s Electronic Case Filing Program:

- **Michael Akemon** mutepe.akemon@richardslegal.com
- **Ainsworth G Dudley** adudleylaw@gmail.com
- **Evan Owens Durkovic** ecfgamb@aldridgepите.com, edurkovic@ecf.courtdrive.com
- **Robert G. Fenimore** robert.g.fenimore@usdoj.gov, Ustp.region21.mc.ecf@usdoj.gov
- **Will Bussell Geer** wgeer@rlkglaw.com, notices@nextchapterbk.com; willgeer@ecf.courtdrive.com;2836@notices.nextchapterbk.com;6717577420@filings.doctbird.com;geer.willb117921@notify.bestcase.com;emiller@rlkglaw.com
- **Whitney Warnke Groff** whitney.groff@cobbcounty.org
- **Elizabeth A. Hardy** elizabeth.a.hardy@usdoj.gov, Ustp.region21.mc.ecf@usdoj.gov; elizabeth.hardy.collins@usdoj.gov
- **Brian K. Jordan** ecfgamb@aldridgepите.com, bjordan@ecf.courtdrive.com
- **Christina T. Lanier** christina.t.lanier@usdoj.gov, southern.taxcivil@usdoj.gov
- **Jonathan Loegel** jonathan@loegel.com
- **Roy E. Manoll** kdd@fbglaw.com
- **Louis G. McBryan** lmc Bryan@mcbryanlaw.com, alepage@mcbryanlaw.com
- **Garrett A. Nail** gnail@pgnlaw.com
- **Jason M. Orenstein** jmopclaw@yahoo.com
- **James D. Silver** jsilver@kklaw.com, raldama@kklaw.com
- **Christopher W. Terry** chris@boyterry.com, terrycr40028@notify.bestcase.com
- **U.S. Trustee - MAC** Ustp.region21.mc.ecf@usdoj.gov

I further certify that on the date indicated below, I caused a copy of the Response to be served upon the following parties listed below via U.S. First Class Mail, postage prepaid:

Tiffany Thompson
20 Rockdale St.
#329
Braintree, MA 02184

Respectfully submitted this 11th day of August, 2023.

JONES & WALDEN LLC

/s/ Thomas T. McClendon

Thomas T. McClendon

Georgia Bar No. 431452

699 Piedmont Ave. NE

Atlanta, Georgia 30308

(404) 564-9300

tmcclendon@joneswalden.com

Liquidating Trustee